

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
_____X

MELISSA ZARDA, et al.,

NOTICE OF MOTION

Plaintiffs,

-against-

10-4334-CV (SJF) (AYS)

RAYMOND MAYNARD, as predecessor
in interest, sole shareholder and alter ego
of ALTITUDE EXPRESS, INC.,
and RAYMOND MAYNARD, individually,

Defendants.
_____X

PLEASE TAKE NOTICE that on such date as the parties have agreed or will agree and court that the Court has will allow, the undersigned will move before the Honorable Sandra J. Feuerstein (Magistrate Judge Anne Y. Shields, for report and recommendation) at the United States District Court, Eastern District of New York, 100 Federal Plaza, Central Islip, NY 11722, for the following orders:

1. Enforcing the judgments of the Second Circuit Court of Appeals and the United States Supreme Court in this matter as a matter of law;
2. Granting sanctions in the form of attorneys' fees under 28 U.S. Code § 1927 against Saul Zabell and Zabell & Collata, P.C. for their vexatious refusal to recognize the properly entered judgements against Raymond Maynard (individually) of the Second Circuit and United States Supreme Court;
3. Requiring Raymond Maynard and Saul Zabell (or Zabell & Collata) to post a bond to prevent against further vexatious litigation, as expected;
4. Striking the defendant's points of law as a sanction for not paying the judgments of

costs by; and

5. Such other relief as may be just and proper.

Dated: New York, New York
March 9, 2021

Yours, Etc.,

/s/

GREGORY ANTOLLINO
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